manatt

Anthony J. Staltari Manatt, Phelps & Phillips, LLP Direct Dial: (212) 790-4640 AStaltari@manatt.com

August 9, 2021

VIA ECF

Hon. Anne Y. Shields United States Magistrate Judge United States District Court Eastern District of New York 100 Federal Plaza - P.O. Box 830 Central Islip, New York 11722

Re: Perrong v. Charles Baratta LLC, et. al, Case No.: 2:21-cv-00996 (JS)(AYS)

Dear Magistrate Judge Shields:

We represent defendant Law Office of Cohen & Jaffe, LLP ("Cohen") in the above-referenced action, and write with the consent of counsel for Plaintiff to request an extension of time for Cohen to answer, move or otherwise respond to the Second Amended Complaint in this action.

Pursuant to Rule III of the Court's Individual Rules and Practices, the parties respectfully request that the time in which for Cohen to answer, move or otherwise respond to the complaint be extended to August 27, 2021. Currently, the last day for Cohen to respond to the complaint is August 13, 2021. This is Cohen's first request for an extension of time to respond to the complaint. The parties request this 14-day extension because counsel for Cohen was recently retained and requires time to assess the matter and prepare a response to the complaint.

If the Court approves of this request, we respectfully request that it "So Order" this letter. We thank the Court for its consideration of this matter.

Respectfully submitted,

s/ Anthony J. Staltari

Anthony J. Staltari

cc: All counsel of record via ECF